Larry Geller

3264 Melemele Place Honolulu, Hawaii 96822

12 December 2002

Federal Communications Commission 445 12th Street, SW, Room TW-A325 Washington, DC 20554

Subject: Comment with regard to:

Hawaii State Certification Renewal Application Telecommunications Relay Services (TRS) 47 C.F.R. § 64.604 & 47 C.F.R. § 64.605 May 1, 2002 FCC Public Notice (DA 02-1006)

This Comment includes attachments appended to text.

For the reasons detailed below, I request that the FCC **not approve** the Hawaii application for certification renewal of its telecommunications relay services **until and unless** violations of applicable rules and impediments to the use of the telephone Speechto-Speech service are removed.

I. Failure to meet mandatory minimum standards

Failure to address Speech-to-Speech relay service in Application

Although the Hawaii State Certification Renewal Application (herein "Application") discusses the technical implementation for text TTY, it omits completely any description of the technical implementation for speech-to-speech (see Application, p. 7 ff, B. Technical Standards). The omission is significant because a description of the implementation of the speech-to-speech service by Verizon Hawaii would make it clear that Hawaii's implementation does not meet technical standards as required by 47 C.F.R. §64.604 (b).

Because of problems with the service as currently implemented, users with speech-disabilities and those who would use the speech-to-speech service to communicate with them are inhibited from doing so.

Service is found by users to be unintelligible

Verizon has chosen to provide speech-to-speech services through a contractor located in the state of Virginia. The contractor employs Communication Assistants (CAs) who speak in a strong Southern dialect. While presenting little difficulty to telephone users in states bordering Washington, DC, the dialect is a stopper for callers in Hawaii. Both users with speech-disabilities and the persons they are calling (or called by) face obstacles in understanding the CAs, and thus there is a failure to meet technical standards as well as a violation of equivalence because uses without disabilities are not faced with this double barrier.

Because of the difficulty understanding the CAs, Hawaii users, both those with speech-disabilities and those who attempt to use the service to call them, have reported that after trying the service once or twice, they are not inclined to use it further.

Their difficulty can be more specifically defined. Speech pathologists have long noted the difficulties that the Southern dialect presents. For example, the vowel sounds in the words Ma, me, my, Moe, Moo are all phonemically distinct in "standard" North American English. For a Southern dialect, the vowels in Ma and my are not phonemically distinct.

Other problem words would be those such as "pride" and "right", which sound like "praad" and "raht" and confuse users of the service. Hawaii users also cannot distinguish between a "pen" you write with and a "pin" you stick as spoken in Southern dialect.

As a final example, users of the Southern dialect commonly substitute certain monothongs for diphthongs (i.e., "old" for "oiled").

Queens College professor Charles Hadley, who has taught the course "Sounds of Standard American English" for more than 40 years and has tutored actors Vivien Leigh, Charlton Heston and Robert Duvall on their Southern accents, commented in a newspaper article (The State, Columbia, SC, August 14, 2000, Page A1), "Time is of the essence in business. If they can't understand you on the telephone, you're in trouble." Potential users in Hawaii find they are wasting their time when they encounter a Verizon-contracted CA with an impenetrable Southern accent. This is in addition to the time wasted during the process of transferring the call from the Hawaii-based 711 operators to the contractor on the Mainland. After a few tries, users typically choose not to use the service again. Accordingly, the service as it is now does not provide functional equivalence to telephone service for those without speech disabilities.

Verizon appears therefore to be in violation of 47 C.R.F. §64.604 (a) (1):

Mandatory minimum standards.

(a) Operational standards--(1) Communications assistant (CA). TRS providers are responsible for requiring that CAs be sufficiently trained to effectively meet the specialized communications needs of individuals with hearing and speech disabilities; and that CAs have competent skills in typing, grammar, spelling, interpretation of typewritten ASL, and familiarity with hearing and speech disability cultures, languages and etiquette. *CAs must possess clear and articulate voice communications*. CAs must provide a typing speed of a minimum of 60 words per minute. Technological aids may be used to reach the required typing speed. Providers must give oral-to-type tests of CA speed. TRS providers are responsible for requiring that VRS CAs are qualified interpreters. A "qualified interpreter" is able to interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary. (emphasis added)

Communications Assistants have difficulty understanding local dialect and common place names

A converse problem exists – CAs are not able to understand commonly used local words that appear in everyday conversation in Hawaii. The use of words that are not found on the East Coast of the United States is common among speakers of all educational levels and backgrounds. Many of them are place names, others reflect common, everyday speech unique to this island state.

The examples given below do not even touch on the issues around understanding the nuances of the dialects spoken by people of different ethnic origins in Hawaii, which is the most ethnically diverse of any state in the country. Also, these examples are not "extreme", they occur broadly in our population and would be found in typical phone conversations. These are not "slang" expressions.

Examples:

- "When you pau?" asks when the correspondent will be done with work that day. "Pau" is a word used by essentially all speakers in various contexts to mean "finished" or "done." "Pau hana" is commonly used for "finished work."
- A common lunch might include Spam musubi. An operator in Virginia would choke on the word.
- "Which keiki you going take to da store?" One parent asks the other which of the children she/he will take along to help with shopping.

- "Da lau lau, da lomi salmon da kalua pig. Wat?" checking on what to buy for dinner. If you do not understand this, how will an operator in Virginia?
- "K'den, I meet you here in 10 minutes" This is an example of a common dialect; "k'den" simply means "ok, then" but it throws the operators.
- A small meal or snack is commonly "pupus," a word used and understood by virtually all speakers in Hawaii. But again, not by operators in a different state. One would be invited over for pupus when pau hana.
- "Please deliver the pizza to 1234 Kalanianaole Highway." Since street names are generally Hawaiian words, the CA is unequipped to accurately relay common addresses. The example given is a common street name. Others are Auwaiolimu Street, Waiakamilo Rd., Uapoaihala Pl. Even shorter names like Aiea, a large residential and shopping area, present problems to out-of-state operators.
- An operator must correctly relay mauka and makai in addresses and directions. North and South are not generally used here.

In emergency situations, what is the likelihood of an ambulance arriving at the correct destination if the place names present an obstacle to the CA? Mispronunciation or inability to relay common words is a strong disincentive to use of the speech-to-speech relay service for less urgent needs, such as ordering a pizza, making a doctor's appointment, requesting delivery of supplies or purchases, making appointments, extending invitations, and so forth. And without the ability to use the service freely, it will not serve in more urgent or emergency situations either, due to unfamiliarity.

By choosing to contract out-of-state operators, Verizon has doomed the speech-to-speech service in Hawaii to be a frustration to its potential users.

Service connection time is unacceptable

Telephone users without disabilities in Hawaii receive a prompt dial tone and are expeditiously connected. 47 C.R.F. 64.604 (b)(2) Speed of answer requires that

TRS shall, except during network failure, answer 85% of all calls within 10 seconds by any method which results in the caller's call immediately being placed, not put in a queue or on hold. The ten seconds begins at the time the call is delivered to the TRS center's network. The call is considered delivered when the relay center's equipment accepts the call from the local exchange carrier and the public switched network actually delivers the call to the TRS center.

Because Verizon does not provide a direct connection, for example an 800 number to the CA (a simple, inexpensive remedy), callers to the 711 relay center operator must be rerouted manually. While connection for other users is fully automated, speech-disabled

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users calling 711 in Hawaii are delayed considerably and the 10-second requirement is not met.

Hawaii appears also to be in violation of Title IV of the Americans with Disabilities Act of 1990 because individuals with speech disabilities are not provided with telephone services that are functionally equivalent to those provided to individuals without speech disabilities.

II. Outreach

Absence of an effective outreach program

Due to characteristics of the target user population, word of mouth is ineffective in promoting use of the speech-to-speech service. Without sufficient outreach, speech-to-speech call volume in Hawaii will remain low – basically, potential users remain unaware that the service exists.

States where outreach has been effective have realized a dramatic increase in call volume. As an example, the successful California outreach plan demonstrated its success when it resulted in an outbound call volume of 4,000 calls a month. It is possible to demonstrate the effectiveness of an outreach program in this way, but Verizon has not done so. It is not accurate to claim that an effective outreach program is in place when usage data would demonstrate the opposite, and in the complete absence of any quantitative data that would support the claim (number of meetings, attendance, advertisements placed, other measures).

In other words, the claim that outreach is taking place is not only unsupported in the Application but contradicted by the lack of increase in call volume.

Due to the lack of an effective outreach program, users with speech disabilities who were to be provided with telephone services that are functionally equivalent to those provided to individuals without speech disabilities have been denied those services.

Absence of information in telephone directories

Verizon's White Pages directories for 2001 and again for 2002 fail to mention relay services in the table of contents. Accordingly, someone seeking information is not assisted in finding it among the 70 pages or so of customer information at the front of the directory.

Inside the front cover, Text Telephone (TTY) services and the 711 number are listed as the last item (bottom right) but not speech-to-speech services.

Should readers stumble across the two sentences hidden at the end of the next-to-last paragraph on page 15, they will learn that there is a new speech-to-speech service but will receive no information whatsoever on using it or on how or where to enquire. Indeed, the next (last) paragraph implies that 711 is only for TTY users, further obfuscating the reader's ability to understand the speech-to-speech service and discouraging further inquiry.

Despite the assertion of compliance in the Application, Hawaii appears to be in violation of 47 C.F.R. § 64.604 (c) (3):

(3) Public access to information. Carriers, through publication in their directories, periodic billing inserts, *placement of TRS instructions in telephone directories*, through directory assistance services, and incorporation of TTY numbers in telephone directories, shall assure that callers in their service areas are aware of the availability and use of *all forms of TRS*. Efforts to educate the public about TRS should extend to all segments of the public, including individuals who are hard of hearing, speech-disabled, and senior citizens as well as members of the general population. In addition, each common carrier providing telephone voice transmission services shall conduct, not later than October 1, 2001, ongoing education and outreach programs that publicize the availability of 711 access to TRS in a manner reasonably designed to reach the largest number of consumers possible. (emphasis added)

Evidence of compliance would include an entry in the table of contents referencing speech-to-speech services, enough description of the service so that a potential user would recognize the benefit it is intended to provide, a reference on how to get information or how to begin to use the service, and sufficient highlighting through text and graphics so that the description would qualify as "outreach". As it is, the two sentences do not even qualify as minimally acceptable documentation.

Failure to conduct ongoing education and outreach programs on speech-to-speech services

The Application (p. 11, "2. Public Access to Information") states that "The TRS program provides information about the availability and operation of TRS in Hawaii in several ways" but the subsequent material relates only to text (TTY) and appears to omit speech-to-speech entirely.

The Verizon "TRS User & Listings Guide", dated August 2002, does not include speech-to-speech in its table of contents. The description of speech-to-speech appears on page 3 and consists of two paragraphs plus a paragraph on Spanish-language speech-to-speech. There is no further mention until the Definitions page inside the back cover. Thus, speech-to-speech is addressed in only three paragraphs in a 37-page guidebook, without reference in either a table of contents or an index.

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While there is mention in the Application of a "presentation to inform schools, business and Senior Citizen's groups about TTYs and TRS", there is no indication of how many presentations were made or if speech-to-speech was included. The fact that "presentation" is rendered in the singular is also troublesome. I am not aware of presentations to senior citizens' groups on the service, and the Application fails to state the number or extent of presentations – or of any outreach activities whatsoever – to substantiate the assertion that the requirements of this rule are met even minimally with regard to speech-to-speech.

The section cited above requires outreach to those who are speech-disabled and to senior citizens. Hawaii has not even specifically claimed to have met this requirement in the Application with regard to speech-to-speech services. Indeed, the reality is that there seems to be essentially no awareness of the service at facilities providing care to senior citizens and none among senior citizens themselves. In the absence of visit counts or other evidence of outreach, it is safe to assume that there is little outreach taking place.

III. Non-Response to Complaints

After meeting with some users of the service and learning of their difficulties, I sent a fax to Verizon on August 16, 2002 (see Attachment A). Receiving no reply, I mailed a copy of the fax to Verizon after a couple of weeks had passed. The letter included a copy of a front-page newspaper article that appeared on August 15, 2002. Both the article and the letter were highly critical of Verizon's operation of the speech-to-speech service. To-date, neither the fax nor the follow-up letter has elicited any reply from Verizon.

Request to Deny Recertification

In view of the evidence that the TRS program in Hawaii is not in compliance with 47 C.F.R. §64-604, I respectfully request that recertification be denied and that the FCC require correction of the violations described above.

Sincerely,

Larry Geller

Attachments:

- A. Letter to Verizon dated August 15, 2002
- B. Oahu 2001 phone book pages
- C. Oahu 2002 phone book pages
- D. Verizon TRS table of contents

Attachment A: Letter to Verizon dated August 15, 2002

Hawaii Coalition for Health

Mr, Ivan G. Siedenberg President and CEO Verizon Communications 1095 Avenue of the Americas New York, New York 10036

— via fax: 212-921-2917 —

August 16, 2002

Dear Mr. Siedenberg:

It was very disappointing to read the attached story which ran in the Honolulu Star-Bulletin yesterday. I was one of the many people who attended the demonstration of Speech-to-Speech in Honolulu and was able to observe the problems with the local 711 service mentioned in the article.

Although we may be thousands of miles away from Verizon's corporate offices, I wanted to bring this problem directly to you in the hopes that you can resolve it quickly. Nothing would please me more than to see another front-page article about how soon Verizon has moved to correct the problems, which are apparently long-standing and have affected the ability of disabled people to use the 711 Speech-to-Speech service thus far.

The representatives from Verizon Hawaii were very helpful and enthusiastic. They came with instructions and other helpful information. They seemed to really want the demonstration to succeed. Unfortunately, it didn't – and for reasons out of their hands, according to the article.

I'm hoping for a quick fix and better support for this important service, the cost of which is taken out of subscriber's phone bills each month. Please let me know what can be done.

Sincerely,

Larry Geller

Executive Director

Hawaii Coalition for Health

Attachment: Honolulu Star-Bulletin August 15, 2002 front page:



http://starbulletin.com/2002/08/15/news/story4.html

Thursday, August 15, 2002



AYUMI NAKANISHI / ANAKANISHI@STARBULLETIN.COM
Bob Segalman gave a demonstration recently of the Speech-to-Speech service, which enables people with speech disabilities to make an independent phone call. With him were revoicer Eda Wilson, center, and Barbara Fischlowitz-Leong, Assistive Technology Resources Centers of Hawaii executive director.

Island phone system for disabled criticized

The founder of a federal program says the system is a failure

By Helen Altonn haltonn@starbulletin.com

The founder of a federally mandated system enabling people with speech disabilities to use the telephone says Hawaii's system is not working right.

Bob Segalman came here to demonstrate and encourage use of the Speech-to-Speech relay system, which he developed because of a cerebral palsy-related speech disability.

But if he had realized how bad the system was in Hawaii, he said: "I wouldn't have come here. I would have advocated that they fix it before I come."

Segalman, who talks in a whisper because of his impairment, and this reporter used the relay system for an interview this week.

After an operator functioning as translator repeatedly said, "Please repeat," he broke off the connection and used a communication assistant with him to finish the talk.

The Speech-to-Speech service was mandated by the Federal Communications Commission in 1991 and is available in all states 24 hours a day, seven days a week.

It enables people with cerebral palsy, multiple sclerosis, muscular dystrophy, Parkinson's disease, stroke, a brain injury or other problems hampering speech to make phone calls like anyone else to fill a prescription, order a pizza or talk to a friend.

It is estimated that about 11,000 islanders could benefit from the system, but "our understanding, based on discussions, no official report, is that usage has been near zero," said Barbara Fischlowitz- Leong, executive director, Assistive Technology Resource Centers of Hawaii.

They can call 711 toll-free and give the operator the number they want, using their own voice, voice prosthesis or communication device. Specially trained operators act as translators, repeating the words of the speech-disabled caller.

"The (main) problem in Hawaii is that Verizon insists on contracting with AT&T, and AT&T operators are all back in Virginia and they don't understand the Hawaiian dialect," Segalman said, referring to pidgin and ethnic dialects.

The operators are supposed to be trained to understand difficult speech and have good amplifiers so they can hear the caller, Segalman said.

"But the AT&T communications assistants don't have the equipment to amplify my voice, so that doesn't work."

Another problem in Hawaii, Segalman said, is that the operator can take up to five minutes to connect the caller after 711 is dialed. "People just give up."

One person who tried the 711 route and became frustrated is dialing a toll-free 877 number that goes through Washington state, Fischlowitz-Leong said.

"We were circumventing Hawaii because Washington contracted with Sprint services, which are excellent."

Ann Nishida, Verizon Hawaii spokeswoman, said she could not say how many islanders are using the AT&T relay service or what it costs because that is "proprietary information."

"I can say we are disappointed with STS usage in Hawaii thus far, but we hope that through our continued outreach efforts, usage will increase.

"Based on recent customer feedback about the service, we've met with the vendor and are working to resolve any issues," Nishida said.

"Prior to this, Verizon Hawaii had not received detailed customer feedback about STS upon which to follow up."

She said Verizon wants people to get all the benefits possible from the telephone, and if those using STS encounter problems, "we need for them to tell us about it so it can be addressed with the vendor."

Nishida said Verizon Foundation gave the Assistive Technology Resource Center a \$10,000 grant to educate prospective STS users and health care professionals about the system.

Verizon offers free booklets to inform people with hearing and speech disabilities about available telecommunications services. They are at all Verizon PhoneMart stores.

Fischlowitz-Leong said her agency has developed training programs to work with service providers and people who will use STS. It is also trying to document system problems so Verizon can track bad calls, she said.

Verizon customers are assessed 17 cents per month in their phone bills for FCC-mandated relay services, including STS and services for the deaf and hard of hearing, as well as equipment, staff, materials and training. Some people with speech disabilities use a TTY, or text telephone, to make calls. It is a teletype-like device used by the deaf and hard of hearing, as well as hearing people who want to talk with another TTY user.

STS is an option for people who do not have the ability to type or to type as fast as they wish. Segalman said it would be much better for Hawaii to train local communications assistants, as the Assistive Technology Resource Center recommended.

Nishida said Verizon wanted to train local people to handle the calls but did not have enough time before the system was required to start in March of last year.

"The problem is, the local people would like to fix it, but the people in the corporate office back in Texas don't want to spend the money," Segalman said.

If it is decided to use local operators, he said, "I will be glad to come back and train them the way I've done in other places without a fee. ... I've been working on this for 10 years. I just want people like me to be able to use the telephone."

Attachment B: Oahu 2001 phone book pages

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SUPERPAGES



WHITE PAGE

AUGUST 2001

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EMERGENCY CALLS FIRE POLICE AMBULANCE Text Telephone (TTY) Accessible

For Nonemergency Calls see Honolulu City and County in the Government Section

OTHER IMPORTANT NUMBERS

See the Island Guide for additional listings
American Red Cross
Armed Forces Police
Board of Water Supply—Trouble Only527-5200
CFS Domestic Violence Hotline & Shelters841-0822
Child Welfare Services Intake Unit (Hotline)
Civil Defense Agency (Oahu)
Civil Defense Agency (State)
Gas Company The—Trouble Only
Hawaiian Electric—Trouble Only
Hawaiian Humane Society
Hazard Evaluation & Emergency Response (State)
Report Chemical/Oil Spills & Pollution Notification 586-4249
After Hours
Highway Safety Hotline (Oahu)
Emergency After Hours
Hyperbaric Center—Bends Treatment
(Oahu)
Lifeguard Service922-3888
Missing Child Center—Hawaii Emergency Hotline753-9797
National Center for Missing & Exploited Children1-800-843-5678
Text Telephone (TTY) Users Dial1-800-826-7653
Poison Center
Sex Abuse Treatment Center
Suicide & Crisis Center
Time of Day
Verizon Hawaii—Repair Service—Repair Resolution Center
Residential & Single Line Business
or1-800-483-1000
Multiline Business & CentraNet®643-6633

CIVILIAN AREAS

Police—Confidential Recorded Message
Coast Guard
Report Toxic Chemical/Oil Spills (Voice/TTY)1-800-424-8802
Search/Rescue Center1-800-552-6458
FBI—Federal Bureau of Investigation566-4300
DCIS —Defense Criminal Investigative Services541-2590
DEA —Drug Enforcement Administration
Or541-1930
NCIS—Naval Criminal Investigative Services
United States Customs Service—
Office of Investigations541-2623
Or
United States Marshals Service541-3000
United States Secret Service541-1912

HOW TO REACH VERIZON HAWAII

For Installation/Additional Services/Changes in Services, call: Residential Customers
Federal Government Customers643-3211
State and Counties Customers
Before You Dig, Call840-1444
For questions about your bill, call:
Residential Customers
Business Customers
For problems with your telephone service, call:
24 Hours a Day—Repair Resolution Center
Residential & Single Line Business Customers
Telecommunications Relay Service
Text Telephone (TTY)

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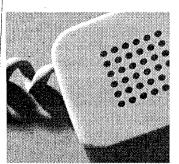


How to Reach Verizon	Hawaii	 	 	2
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GENERAL INFORMATION



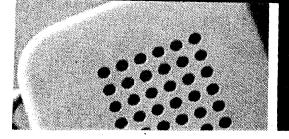
• Calling Instructions
• Area Codes
• Time Zone Map
• International Calling
• State ZIP Codes
• Telephone Safety
• Customer Rights and Responsibilities
• Disaster Preparedness Information
• Neighborhood Safety

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GENERAL INFORMATION



Busy Line

If the number you're calling is always busy, you can ask the operator to check the line to see if the number is working properly. You may be billed a charge if the busy signal is caused by conversation either on the line or by a,n off-hook receiver. Charges may not apply if the busy signal is caused by trouble with telephone lines or switching equipment. If you have an emergency, ask the operator to interrupt the conversation. To ensure that you don't miss emergency calls—even when you're on the phone—check into optional Call Waiting or Voice Mail services.

Calling Assistance For People With Hearing or Speech Disabilities Telecommunications Relay Service

Hawaii has a service, free to its users, that enables callers using Text Telephones (TTYs/TDDs) to communicate with other people who use standard telephones. It's called a Telecommunications Relay Service (TRS). The Americans with Disabilities Act of 1990 requires all states to provide access to nationwide TRS. When you place a call through the TRS, a Communications Assistant will relay telephone conversations verbatim simultaneously between TTY users and non-TTY users. The Communications Assistant translates typed words into speech and spoken words into typed messages, so that TTY users and voice telephone users can converse. Calls made through the relay service are entirely confidential.

To use the TRS, both TTY users and non-TTY users simply dial **711.** TTY users can also reach the TRS by calling **643-8833.** Your local TRS service provider has installed special equipment to allow computer users with modems to access TRS as a TTY user by calling **643-8833.** If you are a voice telephone user and wish to call a TTY user, you may call either **711** or **643-8255.** Tell the Communications Assistant the number you wish to call, and he or she will place the call for you. If you are using the relay service to make a long-distance call, tell the operator which long-distance company you want to handle your call. Some long-distance companies have their own access numbers for relay services. Contact your long-distance provider for more information.

Note: For emergency calls, TTY users should dial **9 1 1.** Emergency service centers in all areas of the state of Hawaii have TTY compatible equipment.

Calls made within the State of Hawaii to the TRS are toll-free. Callers will, however, be billed for any applicable direct-dial toll charges and operator assistance charges on their outgoing call, just as if they had dialed the call themselves. The TRS operates 24 hours a day, seven days a week.

The TRS provides many services: Voice Carry Over is available for TTY users who can speak but are unable to hear. Hearing Carry Over is available for TTY users who can hear but are unable to speak. Spanish language TRS service is also now available. Another new offering is the Speech-to-Speech capability that assists callers who have a speech disability. Specially trained Communication Assistants will repeat what a person with a speech disability says to achieve additional clarity on calls.

Customers with certain disabilities may be exempt from Directory Assistance charges and certain operator assistance charges. This may vary by carrier. Some public payphones are specially equipped to provide service to persons with speech and hearing disabilities. For more information, call the TRS on Oahu at **711** or **643-8833.** Non-TTY users may call **643-8255.**

Attachment C: Oahu 2002 phone book pages

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SUPERPAGES

AUGUST 2002
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CUSTOMER INFO GUIDE

GOVERNMENT PAGES

WHITE PAGES

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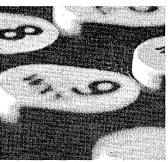
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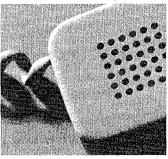


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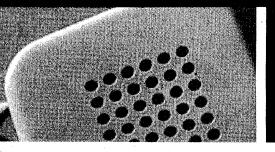
• Calling Instructions
• Area Codes
• Time Zone Map
• International Calling
• State ZIP Codes
• Telephone Safety
• Customer Rights and Responsibilities
• Disaster Preparedness Information
• Neighborhood Safety

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• Notes





GENERAL INFORMATION



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Calling Assistance for People With Hearing or Speech Disabilities

Telecommunications Relay Service

Hawaii has a service, free to its users, that enables callers using Text Telephones (TTYs/TDDs) to communicate with other people who use standard telephones. It's called a Telecommunications Relay Service (TRS). The Americans with Disabilities Act of 1990 requires all states to provide access to nationwide TRS. When you place a call through the TRS, a Communications Assistant will relay telephone conversations verbatim simultaneously between TTY users and non-TTY users. The Communications Assistant translates typed words into speech and spoken words into typed messages, so that TTY users and voice telephone users can converse. Calls made through the relay service are entirely confidential.

To use the TRS, both TTY users and non-TTY users simply dial **711.** TTY users can also reach the TRS by calling **643-8833.** Your local TRS service provider has installed special equipment to allow computer users with modems to access TRS as a TTY user by calling **643-8833.** If you are a voice telephone user and wish to call a TTY user, you may call either **711** or **643-8255.** Tell the Communications Assistant the number you wish to call, and he or she will place the call for you. If you are using the relay service to make a long-distance call, tell the operator which long-distance company you want to handle your call. Some long-distance companies have their own access numbers for relay services. Contact your long-distance provider for more information.

Note: For emergency calls, TTY users should dial **9 1 1.** Emergency service centers in all areas of the state of Hawaii have TTY compatible equipment.

Calls made within the State of Hawaii to the TRS are toll-free. Callers will, however, be billed for any applicable direct-dial toll charges and operator assistance charges on their outgoing call, just as if they had dialed the call themselves. The TRS operates 24 hours a day, seven days a week.

The TRS provides many services: Voice Carry Over is available for TTY users who can speak but are unable to hear. Hearing Carry Over is available for TTY users who can hear but are unable to speak. Spanish language TRS service is also now available. Another new offering is the Speech-to-Speech capability that assists callers who have a speech disability. Specially trained Communication Assistants will repeat what a person with a speech disability says to achieve additional clarity on calls.

Customers with certain disabilities may be exempt from Directory Assistance charges and certain operator assistance charges. This may vary by carrier. Some public payphones are specially equipped to provide service to persons with speech and hearing disabilities. For more information, call the TRS on Oahu at **711** or **643-8833.** Non-TTY users may call **643-8255.**

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